

MEMO ENDORSED

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Hon. Richard M. Berman
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

January 22, 2008

re: U.S.A. v. Anthony Danna
Ind.# 07Cr. 1159 [RMB]

Dear Judge Berman:

I am writing respectfully to Your Honor to request a re-scheduling of the initial court conference from January 23, 2008 to February 7, 2008 at 9:30 a.m. Last week I conferred with Ms. Christine Murray, the Deputy Clerk, and that date is available to the Court, subject to Your Honor's approval. David O'Neil, Esq., the Assistant United States Attorney who represents the government, will be available on that date and he consents to this request. Mr. Danna, my client, remains incarcerated pending the posting of the bail set at his arraignment on the indictment on January 16, 2008 by the Hon. Andrew Peck, U.S.M.J.

The reason for my request of the adjournment is scheduling conflicts of the parties. The defense consents to an exclusion of time pursuant to 18 U.S.C. § 3161 so that the parties may discuss a possible pre-trial plea disposition and for production of discovery, the reasons for the consent exclusion between January 16 and 23, 2008.

Thank you for Your Honor's consideration of this request.

Respectfully yours,
Paul Madden
PAUL MADDEN
Attorney for Mr. Danna

cc: David O'Neil, Esq.

Assistant United States Attorney [by facsimile]

Ms. Anthony Danna [by U.S. mail]

SO ORDERED:

Date: 1/22/08

Richard A. Berman
Richard M. Berman, U.S.D.J.

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